

## **REMARKS**

Claims 1-23 were pending in the application at the time of examination. Claims 1-2, 11, 16 have been amended. Claims 17 – 23 are cancelled. No new matter has been added.

Claims 1-5, 9, 16 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,408,128 B1 issued to Abecassis, which describes a method “for the automated selective retrieval of non-sequentially stored, parallel, transitional, and overlapping video segments from a single variable content video source, responsive to the viewer’s **video content preferences** (Abecassis column 2 lines 1-5).”

It is respectfully submitted that claim 1 recites a combination of limitations not taught by Abecassis. Claim 1 is recited below for reference:

A method for enabling a viewer to create a customized video presentation from one or more preexisting digital video titles, the method comprising:

selecting a video frame from the one or more preexisting digital video titles;

selecting one or more interest points in the video frame;

manipulating the one or more interest points in the associated video frame;  
and

storing a file on a digital video disc (DVD), said file storing the manipulated video frame and having identifiers for relating the manipulated video frame and the one or more interest points to the one or more preexisting digital video titles.

The Office Action states that column 60 lines 18-31, column 21 line 56-column 22 line 5, and column 5 lines 8-10 teach “storing a file on a digital video disc (DVD), said file having identifiers for the single video frame and the interest point,” the file being a video map. The video map taught by Abecassis simply “comprises the various segment combinations that are defined (column 21 lines 32-33)” in a variable content video. Nowhere does Abecassis teach **storing** the file/video map. In contrast, the segments comprising the video map are **predefined** and stored by the **editor** of the variable content video, who is not to be confused with the **viewer/user**, prior to viewer use. According to Abecassis, the viewer simply chooses his preferences from a video preferences list already available on the variable content video, which

includes video content categories, and the system automatically chooses video segments to match the viewer's preferences. Thus, the viewer's viewing options are limited by the video map made available by the editor.

In contrast, the present invention provides means for a viewer/user to edit video frames in a video title on an already completed DVD. The viewer may modify or manipulate points of interest (via zoom, pan, brightness control, addition of text, etc.), and subsequently store his or her modified video frames for later viewing. The viewer's modifications are reconfigurable and may be permanently stored in one of a variety of storage means consistent with the specification, including a DVD. Pg. 8 lines 16-18 describe one described embodiment, in which "NUON<sup>TM</sup> DVD reference player 40 is coupled to a NUON<sup>TM</sup> DVD emulator 60. In one embodiment, NUON<sup>TM</sup> DVD emulator 60 is a storage device such as a hard drive, and is used to emulate the operation of a DVD and for storing any work-in-progress." Thus, the viewer's editing options are not limited by predefined segments stored by the editor on the DVD or other variable content video, in contrast to Abecassis.

In view of the foregoing, it is respectfully submitted that Abecassis does not disclose all of the elements recited in claim 1, and hence, claim 1 is not anticipated by Abecassis. Withdraw of the 35 USC 102(e) rejection is respectfully requested.

A number of the claims were also rejected under Abecassis in view of US 2002/0018136 A1 issued to Kaji et al, which describes an image pickup device including an image processing apparatus "provided with an electronic zooming device for electronically enlarging the image around a selected position in the image area (See Abstract)." It should be noted that, in all illustrated embodiments, the image processing apparatus is coupled to a camera lens. In some embodiments, Kaji describes storing storage means for storing selected information. However, Kaji is merely describing storing an enlarged image in a camera's field of view; the same storage means used by any digital camera. In contrast, claim 1 of the present application requires "storing a file on a digital video disc (DVD), said file storing the manipulated video frame and having identifiers for relating the manipulated video frame and the one or more interest points to the one or more preexisting digital video titles." Again, Kaji is only storing images, and not, as required by the pending claims, identifiers pointing to identified interest points as well as modifications to those interest points, while leaving the original video title video information viewable. In view of the foregoing, it is respectfully submitted that no reasonable modification of Abecassis and Kaji can be used to construct the present invention.

Independent claims 11, and 16 recite limitations similar in scope to those recited in claim 1, and are, therefore, respectfully submitted to be patentable over the art of record for at least the reasons discussed above for claim 1.

All dependent claims depend directly or indirectly on the independent claims, and are, therefore respectfully submitted to be patentable over the art of record for at least the reasons presented above for the independent claims. Additionally, these dependent claims recited additional elements or limitations that when considered in the context of the present invention, further patentably distinguish the art of record.

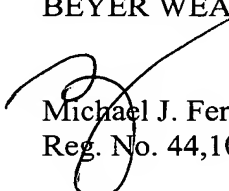
### **CONCLUSION**

In view of the foregoing amendments it is respectfully submitted that the present application is now in condition for allowance. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

If any fees are due in connection with the filing of this Amendment, the Commissioner is authorized to deduct such fees from Deposit Account No. 500388 (Order No. GENSP029).

Respectfully submitted,

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